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A PROFESSIONAL LIMITED LIABILITY COMPANY

April 21, 2022

Via ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
599 Pearl Street
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

4/21/22 
John G. Koeltl, U.S.D.J.

Re: *Ms Dancy a/k/a Dena Wallace v. Westchester ALP Management, LLC, et al*
Civil Action Number: 1:21-cv-03866-JGK

Your Honor:

We represent Plaintiff in the above-referenced matter. This letter-motion is a joint request for an extension of the fact discovery deadline. The initial deadline to complete fact discovery was November 19, 2021, and Your Honor granted two prior requests for extension: one made by Defendants, which extended the deadline to February 21, 2022, and one joint request, which extended the deadline to April 22, 2022.

Since Your Honor granted the most recent request for extension, the Parties scheduled a mediation with the mediator appointed by this Court, Steven M. Bierman, to be held on April 8, 2022. However, on April 6, 2022, Defendants learned of an unexpected scheduling conflict that prevented their participation on April 8, 2022. Thereafter, Defendants were unable to reschedule the mediation prior to the current fact discovery deadline due to the Passover holiday.

The Parties jointly request this extension as we believe that there is opportunity for settlement and are committed to attempting to resolve this matter through the Mediation Program. The Parties have been working to reschedule the mediation at the earliest time possible for all involved, which is tentatively May 18, 2022. With this additional extension, the Parties will have time to participate in mediation, and to schedule all outstanding depositions should the mediation be unsuccessful, without need for any further extensions.

For the foregoing reasons, the Parties jointly propose the following schedule:

- Completion of Fact Discovery: June 21, 2022
- Deadline to submit Expert Disclosures: July 5, 2022
- Completion of Expert Discovery: August 30, 2022

- Dispositive Motions due by: September 27, 2022
- Joint Pre-Trial Order due by: October 18, 2022, or three weeks after decision on any dispositive motions
- Ready for Trial by: November 8, 2022

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Hannah Kucine
Hannah Kucine, Esq.
Dorina Cela, Esq.
Attorneys for Plaintiff

cc: Elizabeth McKenna, Esq. (*via ECF*)
Gary Moy, Esq. (*via ECF*)
Attorney for Defendants